

From: Judy Herschel
To: CELA
Subject: MUR# 7617
Date: Thursday, June 27, 2019 10:47:55 AM

Response -Supporters of Judy Herschel

Dear Ms. Ross,

During my campaign for US Congress, as both Candidate and Treasurer of my Campaign Committee, I documented Rachael Thomas's legal volunteer work with the campaign as "In-Kind" Contributions. The report correctly identifies this, along with the dates and hours of her volunteer work, her standard hourly fee that she would have otherwise charged, her office address her and permanent address. It appears, the change between the two addresses occurred at the time our reporting system changed to NGP which triggered the permanent address as the default, both located in the same town and zip code.

However, she received no payment for her services and the report documented this throughout as in-kind. As identified in the Federal Commission Campaign Guide, there is no cap for in-kind legal services.

Rachael Thomas volunteered her legal services to the campaign, and I, in an abundance of caution, listed this as in-kind. After review, it is quite possible that there was no duty to report at all. As noted in Chapter 7, section 3 of the Federal Election Commission Campaign Guide, an individual can personally volunteer legal services without compensation and that volunteer activity is not reportable.

Please note that this election law violation claim has been made by Angie Hall, the spouse of Alan Hall, who is my current opponent for the County Commissioner's 2019 race in Susquehanna County

If you should have any further questions, please contact me anytime at

Thank you,

Judith Herschel

10047474000